



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

February 3, 1994

Mr. Brad Bradley  
USEPA-HSRL-6J  
77 W Jackson  
Chicago, IL 60604

Re: 1190400007 -- Madison Co.  
Taracorp/NL Industries  
Superfund/Tech

Dear Brad,

Following are IEPA comments for the Final Amended Work Plan for the stabilization project. Most of these comments have previously been addressed with you, the Corps, or OHM personnel.

1. Page 2-15. Section 2.9. Please note that transportation of the treated material will require a non-hazardous manifest.
2. Page 3-1. Section 3.1.1. Transport of hazardous waste will require hazardous waste manifests to transport hazardous waste from the excavation sites to the stabilization area via public roadways. The manifest will reflect that the waste was delivered to a RCRA Part B Permit exempt treatment facility. After successful treatment, a new non-hazardous manifest will be prepared to transport the treated waste to a special waste landfill.
3. Page 3-5. Section 3.5. Same as above comment. Bills of lading are not an acceptable substitute for hazardous waste manifests.
4. Page 4-6. Section 4.4. Please amend this section to reflect that for this project, hazardous wastes will be stabilized and not directly transported to the "hazardous waste disposal subcontractor."
5. Appendix C Page 3. Include the following requirements as ARARS: D-2f(1)(c), D-2f(1)(d), D-3c(4)

If you have any questions please call at 217/782-6760.

Sincerely,

Brian Culnan, Remedial Project Manager  
Federal Site Management Unit  
Remedial Project Management Section  
Bureau of Land